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UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF WYOMING
CHEYENNE DIVISION

RJ WYLD LLC, a Wyoming limited liability company,

Plaintiff and Counterclaim Defendant,

v.

WYLD ADVENTURES LLC, a Wyoming limited liability company,

Defendant and Counterclaim Plaintiff.

Civil Case No. 24-CV-00186-KHR

PLAINTIFF'S MOTION FOR PRELIMINARY INJUNCTION AND REQUEST FOR EXPEDITED HEARING

Pursuant to F.R.Civ.P. 65(a), U.D.C.L.R. 7.1(b)(2), and 15 U.S.C 1051 *et seq.* (The Lanham Act), Plaintiff RJ WYLD, LLC hereby moves for a preliminary injunction prohibiting Defendants WYLD Adventures, LLC from using the name “WYLD” or protected derivatives thereof in connection with retail sales though online market, in store sales, or otherwise.

The plaintiff submits the following materials filed contemporaneously herewith as support for its *Motion*:

- *Plaintiff's Memorandum in Support of Motion for Preliminary Injunction;*
- *Affidavit of Rockie Sadler, along with Exhibits;*
- *Affidavit of Anglia Leiding, along with Exhibits;*
- *Affidavit of Mark Leiding;*
- *Affidavit of Mary Lewis, and*
- *Affidavit of Madison Colby along with Exhibits.*

The Plaintiff respectfully requests that *Plaintiff's Motion for Preliminary Injunction and Request for Expedited Hearing* be set for hearing at the Court's earliest convenience.

WHEREFORE, Plaintiff respectfully prays the Court grant its *Motion* and for other relief the Court deems just and equitable.

DATED this 30th day of January, 2025.

MCDONOUGH LAW GROUP

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CERTIFICATE OF SERVICE

In accordance with the Federal Rules of Civil Procedure, I hereby certify that on **January 30, 2025**, I electronically filed the foregoing **PLAINTIFF'S MOTION FOR PRELIMINARY INJUNCTION AND REQUEST FOR EXPEDITED HEARING** through the CM/ECF system, which cause the following parties or counsel to be served by electronic means, as more fully reflected on the Notice of Electronic Filing.

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